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Attorneys for Plaintiff Stanmore C. Cooper

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

STANMORE C. COOPER,

Plaintiff,

v.

FEDERAL AVIATION
ADMINISTRATION; SOCIAL SECURITY
ADMINISTRATION; UNITED STATES
DEPARTMENT OF TRANSPORTATION,

Defendant.

No. C 07-1383 VRW

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES**

STIPULATION

1. On December 5, 2007, the parties stipulated to extend the deadlines for fact and expert discovery, and dispositive motions because they were in the process of arranging for a private mediation to attempt to resolve the case. On December 12, 2007, the Court ordered new deadlines for fact and expert discovery, dispositive motions, and the pre-trial conference.

2. On January 23, 2008, the parties stipulated to extend the deadlines for dispositive motions and expert discovery to allow time for resolution of outstanding discovery issues and to obtain the transcript of a deposition scheduled for January 31, 2008 prior to filing any dispositive motions. The parties stipulated to extend the dispositive motions and expert discovery deadlines.

3. Pursuant to the parties' stipulation, on January 28, 2008, the Court ordered the following deadlines:

Dispositive Motions Hearing: April 17, 2008

Expert Disclosure: April 16, 2008

Expert Discovery Cut-Off: May 28, 2008

Pretrial Conference: June 12, 2008 at 3:30 p.m.

4. Given the Court's unavailability in April and May, the parties respectfully stipulate to extend the deadlines for dispositive motions and the pre-trial date as follows:

Deadline for filing dispositive motions: May 1, 2008

Dispositive Motions Hearing: June 5, 2008

Pre-trial Conference: July 31, 2008

IT IS SO STIPULATED.

DATED: March 6, 2008

Respectfully submitted,

JOSEPH P. RUSSONIELLO
United States Attorney

/s/
JENNIFER S WANG
Assistant United States Attorney

1 DATED: March 6, 2008

2 REED SMITH, LLP

3 /s/
4 JAMES M. WOOD
5 TIFFANY RENEE THOMAS
6 Attorneys for Plaintiff Stanmore C. Cooper
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~~PROPOSED~~ ORDER

Pursuant to the parties' stipulation and good cause having been shown, it is ordered that:

1. The deadline for filing dispositive motions is May 1, 2008.
2. The last date for dispositive motions hearing is extended to June 5, 2008.
3. The Pretrial Conference is set for ~~July 31, 2008~~ August 7, 2008 at 3:30 PM.

IT IS SO ORDERED.

DATED: 3/10/08

